

# **EXHIBIT P**

**AFFIDAVIT OF BETTY ADAMS**

STATE OF MICHIGAN)

) ss.

COUNTY OF WAYNE)

I, Betty Adams, being duly deposed and under oath, states as follows based upon my own personal knowledge and capacity to make this affidavit:

1. I am an adult resident of the State of Michigan and otherwise competent to make this affidavit. If called to testify to the facts herein, I would and could do so with first-hand knowledge and under the penalty of perjury.
2. I am currently the Library Director at the Leanna Hicks Public Library/Inkster Public Library located in the City of Inkster in the State of Michigan. I have been employed with the City of Inkster since August 31, 2020.
3. At all relevant times in the Amended Complaint, I was employed full-time with Leanna Hicks Public Library/Inkster Public Library as a Library Director.
4. As the Library Director of the Leanna Hicks Public Library/Inkster Public Library, one of my duties is administering the Leanna Hicks Library/Inkster Public Library Facebook Page.
5. On or about October 6, 2020, I lost access to the Leanna Hicks Library/Inkster Public Library Facebook Page.

PINNED POST



Leanna Hicks Library / Inkster Public Library

October 5, 2020 · 🌐

There are three messages in our inbox, which @facebook is not allowing us to check. We apologize if you tried to reach us through messenger, please email badams@inksterlibrary.org with any questions or recommendations. We are unsure why the website is rerouting us back to our homepage when we click "inbox" and have yet to find a way to resolve this issue but we are working on it.

Page

Inbox 3

Event

6. To my knowledge, the only way to publish a post to the Leanna Hicks Library/Inkster Public Library Facebook Page is through the Leanna Hicks Library/Inkster Public Library Instagram Account.
7. To my knowledge, the Leanna Hicks Library/Inkster Public Library Facebook Page nor the City of Inkster has or never had a custom or practice of blocking or banning any person from accessing its Facebook pages. I understand that the City does not allow for blocking or banning individuals from commenting on its social media platforms.
8. As the administrator of the Leanna Hicks Library/Inkster Public Library Facebook Page, I understand that I must seek the City attorney's guidance before removing any comments that are not considered protected speech. I will inform any successor Leanna Hicks Library/Inkster Public Library Facebook Page administrator accordingly.

Further affiant sayeth not.

Betty Adams  
Betty Adams

City of Inkster \_\_\_\_\_

Subscribed and sworn to before me this

24 day of Aug, 2021  
Natalie E. Murphy Notary Public  
Wayne County, Michigan

My Commission Expires: 02/09/2023

Natalie E. Murphy, Notary Public  
State of Michigan, County of Wayne  
My Commission Expires 2/9/2023  
Acting in the County of Wayne